

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA )  
                                )  
v.                            ) No.: 19-cr-10081-IT  
                                )  
GORDON ERNST, *et al.*,    )  
                                )  
Defendants                   )  
                                )

**GOVERNMENT'S MOTION TO DISMISS  
COUNT ONE OF THE SECOND SUPERSEDING INDICTMENT**

The government respectfully moves to dismiss Count One of the Second Superseding Indictment, charging the remaining defendants with racketeering conspiracy, in violation of Title 18, United States Code, Section 1962(d).

Respectfully submitted,

NATHANIEL R. MENDELL  
Acting United States Attorney

By:/s/Kriss Basil  
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Assistant United States Attorneys

CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

Dated: August 31, 2021

/s/Kriss Basil  
Kriss Basil